

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BROOKE PEARCE, as next of friend of §  
U.V., a minor, and JUSTINA GARCIA, §

*Plaintiffs,* §

v. §

Civil Action No. 4:18-cv-3196

FBI AGENT DOE, *in his individual* §  
*capacity,* §

NICHOLAS CHASE CUNNINGHAM; §  
SOPHIA PEREZ HEATH; §  
JIMMY TONY SANCHEZ; §  
DELIA GUALDINA VELASQUEZ; and §  
THE UNITED STATES, §

*Defendants.* §

MOTION TO QUASH PLAINTIFFS' CROSS NOTICE DEPOSITIONS

# Government's Exhibit D

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BROOKE PEARCE, as next friend of §  
U.V., a minor, and JUSTINA GARCIA, §  
*Plaintiff*, §  
§  
VS. §  
§ Case. No. 4:18-cv-3196  
FBI AGENT, in his individual capacity,, §  
NICHOLAS CHASE CUNNINGHAM; §  
SOPHIA PEREZ HEATH; JIMMY §  
TONY SANCHEZ; DELIA DUALDINA §  
VELASQUEZ §  
*Defendants.* §  
§  
§

JURY TRIAL

**CROSS-NOTICE OF DEPOSITION TO PLAINTIFF, JUSTINA GARCIA**

TO: PLAINTIFF, JUSTINA GARCIA by and through its attorney of record.

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure, the plaintiffs will take the depositions upon oral examination, to be recorded by videotape. The deposition will commence on April 3rd, 2024, beginning at 09:59 a.m., and if necessary, the deposition will be adjourned until completed before a duly qualified notary by recorded stenography, videography, or both.

Deponent: PLAINTIFF, JUSTINA GARCIA

Date and Time: April 3rd, 2024, beginning at 9:00 AM

Location: Law Office of Attorney Randall Kallinen, Texas via Video Conference

YOU ARE COMMANDED to produce at the time, date, and place set forth above the following documents, electronically stored information or objects, and to permit inspection, copying, testing, or sampling of the material.

Respectfully submitted,  
THE LEWIS LAW GROUP PLLC  
By: /s/U.A. LEWIS  
U.A. LEWIS  
The Lewis Law Group  
Federal Bar ID No. 1645666  
State Bar No. 24076511  
P.O. BOX 27353  
HOUSTON, TX 77227  
Phone: (713) 570-6555  
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Myattorneyatlaw@gmail.com  
ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded to all parties by ECF electronic filing service on April 2nd 2024

/s/ U.A. Lewis

**U.A. Lewis**